

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

DAVID WAYNE BIGGS,  
Plaintiff,

v.

ROCKTENN CP, LLC AND ROCK-  
TENN SHARED SERVICES, LLC  
Defendants.

§  
§  
§  
§  
§  
§  
§  
§

CASE NO. 3:15-CV-0936-B

**AGREED STIPULATION OF DISMISSAL WITH PREJUDICE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff, DAVID WAYNE BIGGS, and pursuant to FED. R. CIV. P. 41(a), file this his Agreed Stipulation of Dismissal with Prejudice in the above-entitled and numbered cause.

**STIPULATIONS**

1. Plaintiff DAVID WAYNE BIGGS stipulates to the dismissal of each and all of their causes of action asserted against Defendants, ROCKTENN CP, LLC AND ROCK-TENN SHARED SERVICES, LLC, in this action, with prejudice to said actions being refiled against Defendants.

2. All parties hereto stipulate that taxable costs of court shall be borne by the party incurring same.

**LAW OFFICE OF AVERY MCDANIEL**

By: 

**AVERY MCDANIEL**  
State Bar No. 24000121  
**GARETTE M. AMIS**  
State Bar No. 24040425

1205 North Main Street  
Fort Worth, Texas 76164  
Tel: 817-810-9500  
Fax: 817-810-9994  
[avery@averymcdaniel.com](mailto:avery@averymcdaniel.com)  
[garette@averymcdaniel.com](mailto:garette@averymcdaniel.com)

**ATTORNEYS FOR PLAINTIFF**  
**DAVID WAYNE BIGGS**

**SARGENT LAW, P.C.**

By: 

**DAVID L. SARGENT**  
State Bar No. 17648700  
[david.sargent@sargentlawtx.com](mailto:david.sargent@sargentlawtx.com)  
**BRENT W. CHANDLER**  
State Bar No. 24055291  
[brent.chandler@sargentlawtx.com](mailto:brent.chandler@sargentlawtx.com)

901 Main Street, Suite 5200  
Dallas, Texas 75202  
(214) 749-6000 (direct – David Sargent)  
(214) 749-610016 (fax – David Sargent)  
(214) 749-6510 (direct – Brent Chandler)  
(214) 749-6310 (fax – Brent Chandler)

**ATTORNEYS FOR DEFENDANTS**  
**ROCKTENN CP, LLC AND**  
**ROCK-TENN SHARED SERVICES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13<sup>th</sup> day of January, 2016, a true and correct copy of the above and foregoing instrument was forwarded to the following via the ECF filing system:

Avery McDaniel  
Garette M. Amis  
Law Office of Avery McDaniel  
1205 North Main Street  
Fort Worth, Texas 76164

**ATTORNEYS FOR PLAINTIFF**

Kyle Dreyer  
Aaron J. Burke  
HARTLINE DACUS BARGER DREYER LLP  
8750 North Central Expressway, Suite 1600  
Dallas, TX 75231

**CO-COUNSEL FOR DEFENDANTS**

  
**BRENT W. CHANDLER**